

# Exhibit 2

---

**From:** Rodriguez, Jimmy (USATXS) <Jimmy.Rodriguez2@usdoj.gov>  
**Sent:** Monday, February 13, 2023 9:20 AM  
**To:** Zorn, Matt  
**Cc:** Shane Pennington  
**Subject:** RE: AIMs schedule  
**Attachments:** guidance-employee-identities.pdf

Matt,

As a follow-up to the email below, attached is the document regarding employee names.

--Jimmy

---

**From:** Rodriguez, Jimmy (USATXS)  
**Sent:** Monday, January 23, 2023 9:25 PM  
**To:** Zorn, Matt <mzorn@yettercoleman.com>  
**Cc:** Shane Pennington <s.pennington@vicentesederberg.com>  
**Subject:** RE: AIMs schedule

Matt,

As far as I know, there is no other regulation or document being referred to. That said, Ms. Miller has just received her review copy of the transcript and I will let you know if she has any corrections.

Also, on the other document referred to in the deposition regarding employee names. The document she referred to was written by an attorney as legal guidance. That said, it's possible that it could have already been released or made public. I'm working with OIP to track that down.

--Jimmy

---

**From:** Zorn, Matt <[mzorn@yettercoleman.com](mailto:mzorn@yettercoleman.com)>  
**Sent:** Thursday, January 12, 2023 11:28 AM  
**To:** Rodriguez, Jimmy (USATXS) <[jrodriguez3@usa.doj.gov](mailto:jrodriguez3@usa.doj.gov)>  
**Cc:** Shane Pennington <[s.pennington@vicentesederberg.com](mailto:s.pennington@vicentesederberg.com)>  
**Subject:** [EXTERNAL] RE: AIMs schedule

Jimmy,

Sorry, one more follow up. Multiple times the witness referred to an "unusual circumstances" regulation in 28 CFR part 16. She said DEA and DOJ are following DOJ FOIA regulations. But I can't find anything in 28 CFR part 16 except 28 CFR 16.5(c), (d), neither of which provides any gloss on unusual circumstances other than "as defined in the FOIA." Same with 28 CFR 16.10(d).

Could Defendants (1) identify the regulation the witness referred to and (2) If the witness is referring to something else that isn't publicly available, produce that something else.

Thanks very much,

Matt

---

**From:** Rodriguez, Jimmy (USATXS) <[Jimmy.Rodriguez2@usdoj.gov](mailto:Jimmy.Rodriguez2@usdoj.gov)>  
**Sent:** Wednesday, January 11, 2023 10:49 AM

**To:** Zorn, Matt <[mzorn@yettercoleman.com](mailto:mzorn@yettercoleman.com)>

**Cc:** Shane Pennington <[s.pennington@vicentesederberg.com](mailto:s.pennington@vicentesederberg.com)>

**Subject:** AIMS schedule

Matt,

I'm flexible on the schedule that we propose. After you select the deadline to amend pleadings, then say the following:

30 days after amendment Plaintiff moves dispositively (using the Judge's language)

30 days after Defendant responds and moves dispositively

15 days after Plaintiff replies

Let me know what you think

--Jimmy